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FILED VIA ELECTRONIC FILING

The Honorable Leonard P. Stark
U.S. District Court for the District of Delaware
844 North King Street
Wilmington, Delaware 19801

Re: *Crystallex Int'l Corp. v. Bolivarian Republic of Venezuela, et al.*, No. 1:17-mc-151-LPS

Dear Judge Stark:

CITGO Petroleum Corporation (“CITGO”) and PDV Holding, Inc. (“PDVH”) write to express their objection to the Special Master and his Advisors’ December 2021 fees. D.I. 435. CITGO and PDVH continue to object to the magnitude of the Special Master’s fees. Initially, CITGO and PDVH agreed to a \$2 million cap on the Special Master’s fees, as set forth in this Court’s May 27, 2021 Order. D.I. 277 ¶ 15. In total, the Special Master has now charged almost \$3.2 million in fees. As stated in prior objections, CITGO and PDVH reiterate that the Special Master and his Advisors have not provided sufficient justification for these expenses. *See* D.I. 327 at 3; D.I. 371 at 1; D.I. 380 at 1; D.I. 413; D.I. 427 at 1.

At this time, CITGO and PDVH do not request further briefing on the pending fee requests but reserve all rights regarding the fees. CITGO and PDVH appreciate the Court’s attention to this matter and understand that this filing requires expenditure of the Court’s resources. CITGO and PDVH respectfully believe it is important to make their positions clear regarding each of the Special Master’s fee submissions.

Respectfully submitted,

/s/ *Kenneth J. Nachbar*

Kenneth J. Nachbar (#2067)

cc: All Counsel of Record (Via E-Filing)